

SFO trained CPS on corporate settlements ahead of Entain DPA

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Anna McIntyre and Paul Chadwick (Credit: CapitalLaw)

A case controller at the SFO provided training to the Crown Prosecution Service on the use of deferred prosecution agreements in the year before the latter agency reached a £615 million resolution with a gambling company.

Anna McIntyre, who left the SFO to join CapitalLaw in Cardiff in November, told GIR that she helped train the UK's general crime prosecutor in 2021 on using the country's mechanism for resolving criminal investigations with companies.

Since 2014, the Crime and Courts Act 2013 has allowed prosecutors in England and Wales to offer companies a deferred prosecution agreement (DPA) to resolve a criminal investigation. The SFO has [concluded 12](#) such agreements.

Alongside her role as a case controller, McIntyre was a policy lead for deferred prosecution agreements (DPAs) at the SFO, a role which saw her provide training to the Crown Prosecution Service (CPS), which reached its [first-ever DPA, with gambling company Entain in December 2023](#).

"I think with the benefit of hindsight, it was training the CPS for their negotiations on it [the Entain DPA]," she said on a video call from her office, recalling how the UK's general crime prosecutor asked for "very high level" information about how the agreements worked including how the SFO handled previous DPAs, and its differing "attitudes and approaches" to each resolution.

The High Court of England and Wales approved the £615 million resolution between Entain and the CPS to resolve an investigation by UK tax authorities into the company's failure to prevent bribery at a former Turkish subsidiary.

McIntyre also trained authorities overseas, such as Malaysia's Anti-Corruption Commission in 2022 and 2023, on the use of DPAs to resolve corporate investigations, although the country has yet to introduce the mechanism into law.

McIntyre joined the agency from Hogan Lovells in 2019 as a junior lawyer, and worked on the DPA between [the SFO and Amec Foster Wheeler](#) in 2021 and then the "tail end" of [Petrofac's plea agreement for failing to stop bribery](#).

She also led the prosecution of businessman [David Ames over a £226 million fraud](#), which resulted in his conviction in 2022. Towards the end of her time at the agency, McIntyre briefly led the SFO's investigation into suspected [fraudulent trading and money laundering at](#) Sanjay Gupta's GFG Alliance. The case, which remains active, sees the SFO scrutinising the group's financing arrangements including its deals with Greensill Capital, which entered administration in 2021.

Reflecting on her time at the SFO, McIntyre said a good case controller must be "a very skilled project manager" capable of managing resources day-to-day while strategising outcomes for their cases. What she enjoyed most about working at the agency was the ability to have investigators and prosecutors working together – an approach known in the UK as the "Roskill model" – while also employing corporate negotiation skills when dealing with company lawyers.

“You might have somebody who had worked in policing for 30 years working with a junior solicitor from a commercial background who is five years qualified, but those very different legal brains will be coming together to reach a resolution,” she said.

McIntyre's move to CapitalLaw has reunited her with an ex-SFO colleague, former principal investigator Paul Chadwick, who joined the firm's London office in January 2023 after more than a decade at the agency. He worked on the agency's interest rate manipulation investigations and more recently assisted the investigation into Anglo-Swiss mining company Glencore, which pleaded guilty in 2022 to seven counts of breaching the Bribery Act [as part of a billion-dollar cross-border resolution](#).

Chadwick gained experience in intelligence gathering, conducting witness interviews, analysing financial accounts and executing dawn raids in the role; he recalled an “intensive time” working on the Glencore case where he delved into the inner workings of the commodities industry.

“You do get immersed into it and, in the end, you start to learn about different grades of oil and their names, and how business would be done in West Africa back then,” he said.

The former SFO investigator misses certain parts of his old job, such as utilising “information gateways” with other government departments and having powers of compulsion to obtain bank statements or emails quickly and easily.

“I can no longer say: ‘I want what you've got there, here and now,’” Chadwick said. “It was to be expected when moving from the civil sector, but having to rely on your enquiring mind has been a challenge”.

The SFO and the CPS declined to comment.

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